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E-FILED: March 1, 2011

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:) Case No. BKS-11-12764-LBR
) Chapter 13
)
) Hearing Date: N/A
Diwiatt Barker,) Hearing Time: N/A
)
Individually and collectively hereinafter, "Debtor".)
)
)
)

**MOTION TO EMPLOY HAINES & KRIEGER, LLC AND TO APPROVE
ADMINISTRATIVE EXPENSES FOR LOAN MODIFICATION SERVICES**

COMES NOW, the Debtor through the law firm of Haines & Krieger, L.L.C. on behalf of the Debtor and hereby requests this Court to approve Haines & Krieger, LLC to for the purpose of assisting the Debtor and the Chapter 13 estate obtain a loan modification of the Debtor's primary residence.

Debtor filed the instant Chapter 13, Case Number 11-12764 on February 28, 2011.

The Debtor has contracted with Haines & Krieger, LLC for the purpose of obtaining a loan modification to assist with making the Debtor's mortgage payments affordable for the Debtor's primary residence.

The Court may allow the appointment and employment of professionals as needed.

The total cost to the Debtor for Haines & Krieger, LLC's loan modification representation is \$3,500. Any unearned fees shall be turned over to the Chapter 13 Trustee (or the Debtor in the event the instant case is no longer active).

As the Debtor has chosen to hire Haines & Krieger, LLC to provide loan modification services, it is therefore requested that the Court approve the instant application and direct the Chapter 13 Trustee to disburse funds to Haines & Krieger, LLC in the amount of \$3,500.

WHEREFORE the Debtor requests:

1. The Court approve the employment of Haines & Krieger, LLC to be paid as an administrative expense;
2. The Court permit the Chapter 13 Trustee to immediately begin disbursements from funds received from the Debtor to Haines & Krieger, LLC's in the amount of \$3,500 to be paid by funds paid by the Debtor to the Chapter 13 Trustee; and
3. That the Chapter 13 Trustee shall be immediately entitled to administrative fees pursuant to 11 U.S.C. Section 503(b) for funds disbursed.

Dated: March 1, 2011

/s/George Haines Esq.
George Haines, Esq.
Attorney for Debtor(s)

EXHIBIT: FORM OF ORDER

George Haines, Esq.
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**ORDER ON MOTION TO EMPLOY HAINES & KRIEGER, LLC AND TO
APPROVE ADMINISTRATIVE EXPENSES FOR LOAN MODIFICATION
SERVICES**

THE ABOVE Motion having been filed and timely notice provided to all
interested parties pursuant to LR 9014.1 (negative notice procedures):

IT IS ORDERED THAT the Court hereby approves the employment of Haines
& Krieger, LLC to be paid as an administrative expense;

IT IS FURTHER ORDERED THAT the Chapter 13 Trustee shall immediately
begin disbursements from funds paid by the Debtor to Haines & Krieger, LLC's in the
amount of \$3,500;

IT IS FURTHER ORDERED THAT the Chapter 13 Trustee shall be entitled to administrative fees pursuant to 11 U.S.C. Section 503(b) for funds disbursed pursuant to this Order;

DATED March 1, 2011

HAINES & KRIEGER, L.L.C.

By: /s/George Haines, Esq.
George Haines, Esq.
Attorney for Debtor(s)

ALTERNATIVE METHOD re: RULE 9021:

In accordance with LR 9021, counsel submitting this document certifies as follows (check one):

☐ The court has waived the requirement of approval under LR 9021.

☐ This is a Chapter 7 or 13 case, and either with the motion, or at the hearing, I have delivered a copy of this proposed order to all counsel who appeared at the hearing, any unrepresented parties who appeared at the hearing, and any Trustee appointed in this case, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

APPROVED:

DISAPPROVED:

FAILED TO RESPOND:

☐ This is a Chapter 9, 11 or 15 case, and either with the motion, or at the hearing, I have delivered a copy of this proposed order to all counsel who appeared at the hearing, any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]:

☐ I certify that I have served a copy of this order with the motion, and no parties appeared or filed written objections.

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